



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

October 18, 2017

Via Electronic Mail to Travis.A.Wiley@usace.army.mil

Attn: Travis Wiley, Project Manager
Department of the Army
Nashville District, Corps of Engineers
110 9th Avenue South, Room A-405
Nashville, Tennessee 37203

Dear Mr. Wiley:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers (USACE) – Nashville District, *Cheatham Lake Master Plan Update* Draft Environmental Assessment (EA) with an Unsigned Finding of No Significant Impact (FONSI). USACE proposes to update the Cheatham Lake Master Plan¹ which will present a current inventory and assessment of resources, provide an analysis of resource use, and evaluate existing and future needs required to protect and improve the value of resources at Cheatham Lake. The companion Draft EA serves as a guide for coordination of project development and management of all land and water resources.

Actions considered in detail within the Draft EA include:

- **Alternative 1 – No Action Alternative.** The No Action Alternative is defined as USACE taking no action and therefore not implementing an update to the Cheatham Lake Master Plan. Under this alternative, no new resource analysis and allocation would occur, nor would a revision to project sites' inventory be completed. Requirements outlined in policy and regulation subsequent to 1983 would not be incorporated. Operation and management of Cheatham Lake would continue as outlined in the 1983 Master Plan Update. The pre-1996 guidance for land and water classification would remain.
- **Alternative 2 – Implementation of Proposed Master Plan Update.** Action Alternative 2 is the implementation of the proposed Master Plan Update, which would incorporate three components: 1) project land and water allocations and classifications would be made current, 2) an analysis of resource and project use would be conducted, and 3) an evaluation of existing and future needs and demands on the project would be completed. Classifications for project lands and water would be updated to reflect current and anticipated use. Implementation of the proposed Master Plan Update is USACE's preferred alternative.²

¹ The original Cheatham Lake Master Plan was approved in 1958 and last updated in 1983.

² According to USACE an update to the Master Plan would allow the most comprehensive update that best reflects environmental stewardship and conservation of Cheatham Lake project lands and waters while meeting public, social, and economic demands.

TDEC has reviewed the Draft EA with Unsigned FONSI and provides the following comments.

Plant and Animal Resources

TDEC concurs that the designation of Environmental Sensitive Areas associated with portions of Units 5, 6, and 7 on USACE fee property will benefit Tennessee threatened and endangered species.³

Water Resources

TDEC notes that comments related to Water Resources concerns were submitted to USACE during the scoping process on May 1, 2017.⁴ All TDEC Water Resource concerns have been addressed in the Draft EA with Unsigned FONSI. TDEC has no further comments regarding the proposed action or its alternative.

TDEC appreciates the opportunity to comment on this Draft EA with Unsigned FONSI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD
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Tennessee Department of Environment and Conservation
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(615) 532-8689

cc: Tom Moss, TDEC, DWR
Mark Norton, TDEC, DOA
Stephanie Williams, TDEC, DNA

³ On April 28 2017, the Tennessee Natural Heritage Inventory Program, within the Division of Natural Areas provided USACE with a map of rare plant and animal species listed under the State legislation. The map included species that were on Cheatham Lake fee and easement lands, or within a one-mile vicinity of the project. There are four areas identified as critical habitat for Short's bladderpod that are partially located on Cheatham Lake Fee property (Units 4, 5, 6, and 7) and another (Unit 8) that is partially located on USACE flowage easement property.

⁴ See Page 50-51 of the Draft EA for original TDEC Division of Water Resources comments in response to the scoping notice.